NO. 35043-6-III

THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION THREE

STATE OF WASHINGTON,

Respondent,

v.

EDUARDO PEREZ,

Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR YAKIMA COUNTY

OPENING BRIEF OF APPELLANT

JAN TRASEN
Attorney for Appellant

WASHINGTON APPELLATE PROJECT
1511 Third Avenue, Suite 701
Seattle, WA 98101
(206) 587-2711

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A. INTRODUCTION

Ethel Porter and her sister Mary Lou Ribail were spending time together in Ms. Porter's home in the town of Outlook, a rural area in Yakima County. Around lunchtime, as the women were laughing and talking, they heard a loud banging noise.

The women heard a voice saying, "I know you're in there." Ms. Porter believed she recognized the voice as her longtime neighbor, Eduardo Perez. Later, the women heard other loud noises in the area. These noises were rocks being thrown through several windows the home, as well as through the windows of Ms. Ribail's car, parked in the driveway.

Despite the property damage, there was no indication that Mr. Perez attempted to enter Ms. Porter's home, or that he intended to do so – nor that he intended to commit a crime therein. When the police arrived in response to Ms. Porter's call, Mr. Perez had remained in the area, and he made no statements suggesting he had tried to enter Ms. Porter's home.

B. ASSIGNMENTS OF ERROR

1. The State presented insufficient evidence to prove beyond a reasonable doubt that Eduardo Perez attempted to commit a residential burglary.

2. The trial court erred by entering legal financial obligations without considering Mr. Perez's ability to pay, due to his mental health condition.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. The United States and Washington Constitutions require the State prove all elements of a charged offense. Must Mr. Perez's conviction for attempted residential burglary be reversed and dismissed where the State failed to prove beyond a reasonable doubt that Mr. Perez attempted to enter Ms. Porter's home?

2. The State must prove all elements of a charged offense. In order to convict an individual of an attempted crime, sufficient evidence must be presented that the accused took a substantial step toward the commission of the crime. Was there sufficient evidence presented at trial for the jury to conclude that Mr. Perez took a substantial step toward the commission of residential burglary, and specifically that he intended to commit a crime within the residence?

3. RCW 9.94A.777(1) requires that a sentencing court determine whether a defendant who suffers from a mental health condition has the ability to pay any LFOs, mandatory or discretionary. Did the trial court abuse its discretion by failing to determine whether Mr. Perez had the ability to pay LFOs in light of his mental health condition and should this Court should remand?

D. STATEMENT OF THE CASE

For many years, Eduardo Perez lived with his mother in a small house in the rural community of Outlook, in Yakima County. RP 45-49.[1] The homes in this community are surrounded by generous acreage, including vineyards and fields in which cattle sometimes graze. RP 45-51.

Next to the Perez house is a home owned by Ethel Porter, who was approximately 79 years old at the time of the events described.[2] Ms. Porter's home is separated from Mr. Perez's house by a small field. RP 49. A lane runs by the mailboxes serving the two homes and

[1] The verbatim report of proceedings consists of two consecutively-paginated volumes, referred to as "RP __." A separately-paginated volume containing hearings conducted in 2015-16 is referred to as "2RP."

[2] By the time of the trial, Ms. Porter stated she was 81. RP 45.

connects the houses to the main road. Id. The two families have lived next door to each other peacefully for over 50 years. Id. at 49, 79. (discussing the Perez home being owned by Mr. Perez and his mother Beatrice, and before that, by the Perez grandparents).

On September 30, 2015, Ms. Porter's older sister Mary Lou Ribail drove over to the Porter home for a visit. RP 54. At approximately 11:00 a.m., the two sisters were socializing inside the house when they heard a loud sound at the front door. RP 56. Ms. Porter heard a voice outside "hollering and cussing," stating, "I know you're in there." RP 57-58. Ms. Porter believed the voice belonged to Mr. Perez, based upon her previous conversations with him. Id.[3]

Ms. Porter's front door was never opened, nor any other door to her home, but the two women began to hear the sound of windows breaking. RP 57-59. Ms. Porter and her sister began to see rocks coming through the windows of the home, until almost every window of the house was broken. RP 57-59. At one point, Ms. Porter looked

[3] Ms. Porter stated Mr. Perez complained that the Porter grandsons were peeking into the Perez windows and saying things about Mr. Perez. RP 51-52. Mr. Perez also claimed the boys had taken his cell phone from the vineyards near both homes. RP 52. A neighbor dispute ensued.

through the window blinds and saw a figure in a red shirt, who she believed to be Mr. Perez. RP 60.

Ms. Porter called 911, and the Yakima County Sheriff's Department, as well as the Sunnyside Police Department, responded to the scene. RP 139, 185. Extensive damage was noted to the windows of Mr. Porter's house, as well as to Ms. Ribail's car, which had been parked in the driveway. RP 61-69, 99-102.

When officers arrived, Mr. Perez was in front of his own home, next door to Ms. Porter's house. RP 142. When Officer Thomas Orth asked Mr. Perez to come speak with him, Mr. Perez cooperated. RP 145. Mr. Perez's only statement was, "It's the neighbor, it's the neighbor." RP 145-46. Mr. Perez also asked the officer to accompany him to Ms. Porter's house to help him explain, telling the officer, "Let's go to the neighbor's." RP 146-47. Mr. Perez never suggested he was trying to enter Ms. Porter's house.

Mr. Perez was charged with attempted residential burglary, malicious mischief in the third degree for the damage to Ms. Porter's house, and malicious mischief in the second degree for the damage to Ms. Ribail's car. CP 10-11.

Following trial, Mr. Perez was acquitted of the malicious mischief count related to the car. CP 58. He was convicted of attempted residential burglary and malicious mischief in the third degree for the damage to the house. CP 56, 57.

E. ARGUMENT

1. THE STATE PRESENTED INSUFFICIENT EVIDENCE TO CONVICT MR. PEREZ OF ATTEMPTED RESIDENTIAL BURGLARY.

a. The State bears the burden of proving all essential elements of an offense beyond a reasonable doubt.

The State has the burden of proving each element of the crime charged beyond a reasonable doubt. In re Winship, 397 U.S. 358, 364, 90 S.Ct. 1068, 25 L.Ed.2d 368 (1970); Blakely v. Washington, 542 U.S. 296, 300-01, 124 S.Ct. 2531, 159 L.Ed.2d 403 (2004); Apprendi v. New Jersey, 530 U.S. 466, 490, 120 S.Ct. 2348, 147 L.Ed.2d 435 (2000); State v. Hummel, 196 Wn. App. 329, 352, 383 P.3d 592 (2016), review dismissed, 187 Wn.2d 1021, 390 P.3d 333 (2017); U.S. Const. amend. XIV; Const. art. I, § 3.

The absence of proof of an element beyond a reasonable doubt requires dismissal of the conviction and charge. E.g., Jackson v.

Virginia, 443 U.S. 307, 319, 99 S.Ct. 2781, 61 L.Ed.2d 560 (1979); State v. Green, 94 Wn.2d 216, 616 P.2d 628 (1980).

b. The State did not prove Mr. Perez took a substantial step to enter the building.

To prove a residential burglary, the State is required to prove two elements: (1) that an individual entered or remained unlawfully in a dwelling; and (2) that he intended to commit a crime against a person or property therein. RCW 9A.52.025(1).

For the State to prove a person is guilty of an attempt to commit a crime, the State must establish that, with intent to commit a specific crime, the person committed any act which is a substantial step toward the commission of that crime. RCW 9A.28.020(1). "Both the substantial step and the intent must be established beyond a reasonable doubt for a conviction to lawfully follow." State v. Bencivenga, 137 Wn.2d 703, 707, 974 P.2d 832 (1999) (quoting State v. Aumick, 126 Wn.2d 422, 429-30, 894 P.2d 1325 (1995)).

Here, there was insufficient evidence that Mr. Perez took a substantial step toward entering Ms. Porter's home. The State's theory was that Mr. Perez kicked the door of Ms. Porter's home in an attempt to enter. RP 218-19. First, there was no evidence the alleged kicking

was done in effort to enter, as opposed to with intent to cause damage, as with the windows. There was no other evidence presented that Mr. Perez attempted to enter the home, such as actually trying to open the door with the doorknob or using tools to pry open the door. RP 57-60, 91-92. Nor did either witness testify that Mr. Perez attempted to enter through one of the windows that he broke or even reached a hand or any body part into the house. Id., RP 196-97 (officers stated Mr. Perez had no injuries from broken glass when he was arrested).

The State failed to meet its burden to prove a substantial step toward entry of the premises beyond a reasonable; therefore, the conviction cannot stand. Bencivenga, 137 Wn.2d at 707.

c. The State did not prove Mr. Perez had the intent to commit a crime against a person or property within the building.

In addition to proving a substantial step toward entering the home, the State was required to prove Mr. Perez intended to commit a crime against a person or property, once inside. Bencivenga, 137 Wn.2d at 707. Because there was no actual unlawful entry, the State could not rely on an inference of unlawful intent, and had to prove the intent to commit a crime beyond a reasonable doubt. State v. Bergeron, 105 Wn.2d 1, 19-20, 711 P.2d 1000 (1985) (the court may not infer

intent to commit a crime from evidence that is "patently equivocal"); State v. Jackson, 112 Wn.2d 867, 876, 774 P.2d 1211 (1989).

Intent to attempt a crime within a dwelling may be inferred from all the facts and circumstances. Bencivenga, 137 Wn.2d at 709. Facts and circumstances tending to support a finding of intent to commit burglary may include breaking a window as a means of entering,[4] opening an entryway,[5] trying to pry or actually breaking off a lock on a door,[6] admission of intent to enter,[7] possession or use of burglary tools,[8] wearing of dark clothing,[9] and fleeing from the police.[10] The lack of daylight[11] and the presence of inclement weather[12] may also support an inference of intent to commit burglary.

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[4] See Bergeron, 105 Wn.2d at 11.

[5] See Bergeron, 105 Wn. at 11, 19-20.

[6] Bencivenga, 137 Wn.2d at 711; State v. Chacky, 177 Wash. 694, 695-96, 33 P.2d 111 (1934).

[7] See Bergeron, 105 Wn. at 11, 19-20.

[8] See Chacky, 177 Wash. at 695-96.

[9] See Bencivenga, 137 Wn.2d at 709.

[10] See Bergeron, 105 Wn. at 11, 19-20; Chacky, 177 Wash. at 695-96.

[11] See Bencivenga, 137 Wn.2d at 709; Bergeron, 105 Wn. at 11, 19-20; Chacky, 177 Wash. at 695-96.

Mr. Perez's case resembles State v. Jackson. In Jackson, our Supreme Court found the defendant's conduct consistent with malicious mischief, and at best, "patently equivocal." 112 Wn.2d at 876. In Jackson, the defendant approached a business and took several "running kicks at the door and bounc[ed] off … aimed at the window area of the door." Id. at 870. When Mr. Jackson realized he was being observed by police, he attempted to walk briskly away, and was quickly arrested. Id.

As in Jackson, witnesses believed Mr. Perez kicked the door and shouted, but there was no evidence of forced entry or of any similar attempt. RP 189-90, 195 (no evidence that door was opened or doorknob damaged, nor that threshold was crossed). The facts in Mr. Perez's case are even stronger than in Jackson, as Mr. Perez's visit occurred at 11:00 a.m., rather than the evening setting of Jackson. 112 Wn.2d at 870.

This Court reversed a Yakima County burglary conviction in State v. Sandoval. 123 Wn. App. 1, 5-6, 94 P.3d 323 (2004). In Sandoval, this Court set forth the factors it considered when concluding Mr. Sandoval had not intended to commit a crime. Although Mr.

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[12] See Bencivenga, 137 Wn.2d at 709.

Sandoval kicked in the front door of a stranger's home at 3:00 a.m., shoving the owner in the chest, this Court stated, "there is no fact, alone or in conjunction with others, from which entering with intent to commit a crime more likely than not could flow." Id. at 5. The Court noted that Mr. Sandoval was not carrying burglar's tools, he did not try to sneak in, he was not wearing "burglary-like apparel," and he did not attempt to flee. Id. (citing Bencivenga, 137 Wn.2d at 705; Bergeron 105 Wn.2d at 11). The Court also relied upon the fact that Mr. Sandoval "did not try to take any of [the complainant's] property or confess to doing so." Id. at 6 (citing State v. Brunson, 76 Wn. App. 24, 30-31, 877 P.2d 1289, aff'd, 128 Wn.2d 98, 905 P.2d 346 (1995)). This Court should decide Mr. Perez's case similarly to Sandoval and to Jackson, as the cases cannot be meaningfully distinguished.

The circumstances of Mr. Perez's case are similar to those in Sandoval. As in Sandoval, Mr. Perez had no burglars' tools and was not wearing suspicious clothing, but a regular red plaid work shirt. RP 142-43. Likewise, Mr. Perez did not attempt to "sneak in" or flee, nor did he attempt to take any property from Ms. Porter or Ms. Ribail. Mr. Perez's case is even more clear than Sandoval. Here, the incident occurred in the mid-morning, rather than the middle of the night, as in

Sandoval – a factor considered important in this Court's consideration. Bencivenga, 137 Wn.2d at 709, Bergeron, 105 Wn.2d at 10-11.[13]

Washington courts require much more in order to find evidence of intent to commit burglary sufficient. In a case quite different from Mr. Perez's, the Court found in Bencivenga, that there was sufficient evidence of intent to commit burglary where the defendant, "dressed in dark clothing, attempted to pry open the door of [a restaurant] at about 3:30 a.m. in the midst of a snowstorm." Bencivenga, 137 Wn.2d at 709. Similarly, the evidence was sufficient in Bergeron, where the defendant, at 3:15 a.m., broke a window of a residence, slid the window open, and ran when the police arrived. Bergeron, 105 Wn.2d at 10-11. Likewise, the evidence was sufficient in Chacky, where the defendant, around midnight, broke off a lock on a store door with a crowbar, fled from the police, and was found to have other burglary tools in his car. State v. Chacky, 177 Wash. 694, 695-96, 33 P.2d 111 (1934).

[13] Insufficient evidence of intent to commit a crime therein also required reversal of a burglary conviction in State v. Woods, where the defendant and his friend Jeff kicked in a door at Jeff's mother's home, from which Jeff had been excluded. 63 Wn. App. 588, 821 P.2d 1235 (1991). The evidence was insufficient to prove intent to commit a crime, because Jeff had belongings in his mother's home and it was not clear from the unlawful entry or flight that the defendant intended to commit any offense inside the home. Id. at 591-92.

In Mr. Perez's case, even the type of minimal evidence present in Bencivenga, Bergeron, and Chacky is lacking. Ms. Porter's door frame was not damaged; she testified that no repairs were needed for her doorknob or locks. RP 70. Mr. Perez did not try to open the windows or door, and had no injuries indicating he attempted to enter through a broken window. RP 196-97. Mr. Perez had no weapons or burglary tools. He was wearing a red plaid shirt, rather than dark burglar-like apparel. RP 60, 84, 136, 142. It was daytime and there was no evidence of inclement weather. RP 54. When Mr. Perez was later confronted by the police, he had remained near his own home; he spoke with police and made statements that were, at most, equivocal. RP 142-45.

Accordingly, the evidence of Mr. Perez's intent was insufficient to prove beyond a reasonable doubt that he intended to commit a crime within Ms. Porter's home. Because Mr. Perez's conduct was equivocal, as in Jackson, this Court should reverse. 112 Wn.2d at 870.

d. The prosecution's failure to prove all essential elements requires reversal.

The absence of proof beyond a reasonable doubt of an element requires reversal of the conviction and dismissal of the charge.

Jackson, 443 U.S. at 319; Green, 94 Wn.2d at 221. The Fifth Amendment's Double Jeopardy Clause bars retrial of a case, such as this, where the State fails to prove an essential element. North Carolina v. Pearce, 395 U.S. 711, 717, 89 S.Ct. 2072, 23 L.Ed.2d 656 (1969), reversed on other grounds, Alabama v. Smith, 490 U.S. 794, 109 S.Ct. 2201, 104 L.Ed.2d 865 (1989).

The State failed to prove beyond a reasonable doubt that Mr. Perez took a substantial step to enter Ms. Porter's home, and that he intended to commit a crime within the home, each an essential element of the charged offense. Absent proof of every essential element, the conviction must be reversed and the charge dismissed. State v. Hundley, 126 Wn.2d 418, 421-22, 895 P.2d 403 (1995).

2. THE COURT ABUSED ITS DISCRETION WHEN IT FAILED TO CONSIDER MR PEREZ'S KNOWN MENTAL HEALTH ISSUES WHEN DETERMINING HIS ABILITY TO PAY LFOs.

RCW 9.94A.777(1) requires that a sentencing court make an individualized inquiry into a defendant's ability to pay legal financial obligations (LFOs), mandatory or discretionary, when he or she suffers from a mental health condition. State v. Tedder, 194 Wn. App. 753, 756, 378 P.3d 246 (2016).

Our Supreme Court held in State v. Blazina that trial courts "must consider the defendant's current or future ability to pay" based on the "particular facts of the defendant's case." 182 Wn.2d 827, 834, 344 P.3d 680 (2015) (the court shall take account of the financial resources of the defendant and the nature of the burden that payment of costs will impose). The Supreme Court exercised its discretion and reached the merits in Blazina, in large part, due to significant concerns regarding equal justice and the need for reform of the "broken" LFO system. 182 Wn.2d at 835-36; Tedder, 194 Wn. App. at 757.

Here, as in Tedder, Mr. Perez appeared before the sentencing court with a significant mental health history. 194 Wn. App. at 756-57. Mr. Perez was sent to Eastern State Hospital for a competency evaluation in November 2015. 2RP 2-11; CP 5-6. Despite this clear mental health history, Mr. Perez's mental illness was not discussed in terms of his ability to pay LFOs of $1,187.67.[14] CP 52; RP 312 (Mr. Perez's physical disability considered by court, although his mental health condition ignored).

[14] The $387.67 restitution to Ms. Porter is not challenged here. CP 52. The LFOs are comprised of a $500 crime penalty assessment; $200 criminal filing fee; and $100 DNA collection fee, to which Mr. Perez assigns error. CP 52.

Because the "pernicious consequences" of unpaid LFOs are equally damaging for those who suffer from both mental and physical illness, this Court should remand so that Mr. Perez's individual circumstances can be properly considered. Tedder, 194 Wn. App. at 757.

F. CONCLUSION

For the foregoing reasons, Mr. Perez respectfully requests this Court reverse his conviction and dismiss the attempted residential burglary charge. In addition, the Court should exercise its authority to waive all mandatory and discretionary LFOs, due to Mr. Perez's inability to pay due to mental health physical disability, and in the alternative, remand for the trial court to do so.

DATED this 5th day of September, 2017.

Respectfully submitted,

s/ Jan Trasen

JAN TRASEN (WSBA 41177)
Washington Appellate Project
1511 Third Avenue, Suite 701
Seattle, WA 98101
Telephone: (206) 587-2711
Fax: (206) 587-2710
E-mail: jan@washapp.org

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	)	NO. 35043-6-III
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	)	
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	)	
Appellant.	)	

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[David.Trefry@co.yakima.wa.us]	( )	HAND DELIVERY
YAKIMA CO PROSECUTOR'S OFFICE	(X)	E-SERVICE VIA PORTAL
128 N 2ND STREET, ROOM 211		
YAKIMA, WA 98901-2639		
[X] EDUARDO PEREZ	(X)	U.S. MAIL
6551 GAP RD	( )	HAND DELIVERY
OUTLOOK, WA 98938	( )	_____

SIGNED IN SEATTLE, WASHINGTON THIS 5TH DAY OF SEPTEMBER, 2017.

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Washington Appellate Project
701 Melbourne Tower
1511 Third Avenue
Seattle, WA 98101
Phone (206) 587-2711
Fax (206) 587-2710

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